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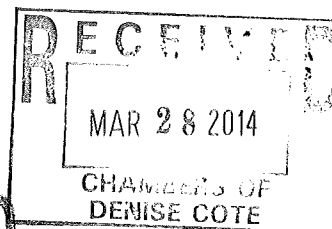
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March 27, 2014

Via Federal Express

The Honorable Denise L. Cote
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 1610
New York, NY 10007-1312

MEMO ENDORSED



Re: *Eastman Kodak Company v. Ricoh Company, Ltd.*, No. 12-cv-3109 (DLC)

Dear Judge Cote:

On behalf of Defendant Ricoh Company, Ltd. ("Rico"), we respectfully submit this letter pursuant to Paragraph 4(A) of the Court's Individual Practices, to seek permission to file under seal three exhibits, and to publicly file redacted versions of its Reply Memorandum of Law In Support of its Motion for Relief From Judgment (the "Motion") (*See* Dkt. No. 246), and the Declaration of David Eiseman in support of Rico's Motion.

These documents and the bases for Rico's requests are described more fully below. Rico also has provisionally filed placeholders for its Reply Memorandum of Law In Support of its Motion for Relief From Judgment and the Declaration of David Eiseman in Support of Rico's Motion through the Court's ECF system, subject to the Court's final instructions.

The full set of Rico's Reply Memorandum and accompanying papers, including unredacted exhibits, was served on Kodak by email on March 26, 2014.

I. Rico Requests Permission to Publicly File Redacted Documents

- Rico's Reply Memorandum of Law in Support of its Motion [TAB 1]
- Declaration of David Eiseman in Support of Rico's Motion [TAB 3]

The above documents contain sensitive business information that is not made public, and that Rico and Kodak make efforts to maintain as confidential. Were such information to be made public, it could be used to Rico's or Kodak's competitive and business disadvantage. To protect this confidential information, Rico respectfully requests that the Court allow it to file

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redacted versions of these documents. Ricoh has made efforts to redact the minimum necessary to protect its business sensitive information. Clean copies of the redacted pages of the above documents are enclosed at tabs following each of the respective highlighted documents.

II. Ricoh Requests Permission To File Under Seal Three Exhibits

- Exhibit A to the Declaration of David Eiseman [TAB 5]
- Exhibit B to the Declaration of David Eiseman [TAB 6]
- Exhibit C to the Declaration of David Eiseman [TAB 7]

The above exhibits contain highly confidential and sensitive business information that is not made public, and that Ricoh and Kodak make efforts to maintain as confidential. They also contain highly confidential and sensitive business information of third parties. In addition, Kodak has designated certain of these documents as containing Kodak Confidential or Highly Confidential information. On March 27, 2104, Kodak's counsel informed Ricoh that certain of these documents contain Kodak and third party confidential information and that Kodak intends to preserve the confidentiality designations of these documents in full. Accordingly, Ricoh respectfully requests permission to file these materials under seal.

Last, please note that two unredacted courtesy copies of Ricoh's Motion and accompanying papers were sent to the Court upon filing.

Thank you for Your Honor's consideration of this submission.

Respectfully submitted,



David Eiseman

Encl.

cc: Robert Gunther, Jr.
Michael Summersgill

